

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

IN RE PHARMACEUTICAL INDUSTRY
AVERAGE WHOLESALE PRICE
LITIGATION

THIS DOCUMENT RELATES TO:

International Union of Operating
Engineers, Local No. 68 Welfare
Fund v. AstraZeneca PLC, et al.
Civil Action No. 04-11503-PBS

MDL NO. 1456

CIVIL ACTION: 01-CV-12257-PBS

JUDGE PATTI B. SARIS

**DEFENDANT ZLB BEHRING LLC'S
LOCAL RULE 16(D)(3) CERTIFICATION**

Defendant ZLB Behring LLC, by the attached, hereby submits its Local Rule 16.1(D)(3)
certification.

By its attorneys:

/s/Michael DeMarco

Michael DeMarco (BBO #119960)

KIRKPATRICK & LOCKHART

NICHOLSON GRAHAM LLP

75 State Street

Boston, MA 02109-1808

(617) 261-3100

Attorneys for Defendants

ZLB Behring LLC

Dated: April 20, 2005

CERTIFICATE OF SERVICE

I hereby certify that on April 20, 2005 a true and correct copy of Defendant ZLB Behring LLC's Local Rule 16.1(D)(3) Certification was served on all counsel of record by electronic means pursuant to Paragraph 11 of Case Management Order No. 2 by sending a copy to Verilaw Technologies for posting and notification to all parties.

/s/ David M. Glynn

David M. Glynn

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

IN RE PHARMACEUTICAL INDUSTRY)
AVERAGE WHOLESALE PRICE)
LITIGATION)
_____)

MDL NO. 1456
Civil Action No. 01-12257-PBS

THIS DOCUMENT RELATES TO:)
)
)

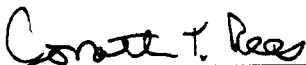
International Union of Operating)
Engineers, Local No. 68 Welfare)
Fund v. AstraZeneca PLC et al.)
Civil Action No. 04-11503-PBS)
_____)

DEFENDANT ZLB BEHRING LLC'S LOCAL RULE 16.1(D)(3) CERTIFICATION

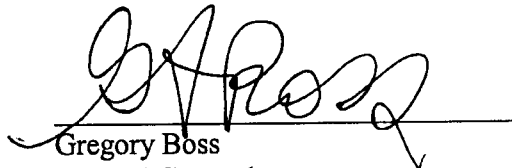
Pursuant to Local Rule 16.1(D)(3), defendant ZLB Behring LLC (f/k/a Aventis Behring LLC) and its attorneys hereby certify that they have conferred with a view to establishing a budget for the costs of conducting the full course—and various alternative courses—for the above-captioned litigation and have conferred to consider the resolution of the litigation through the use of alternative dispute resolution programs such as those outlined in Local Rule 16.4.

By its attorneys:

ZLB BEHRING LLC



William D. Nussbaum
Jonathan T. Rees
Gregory M. Petouvis
HOGAN & HARTSON L.L.P.
555 13th Street, N.W.
Washington, D.C. 20004
Tel: 202-637-5600
Fax: 202-637-5910



Gregory Boss
General Counsel
ZLB Behring LLC
1020 First Avenue
P.O. Box 61501
King of Prussia, PA 19406
Tel: 610-878-4532
Fax: 610-878-4221